

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jean Kidd, Plaintiff, v. Alex Jackson, Chief of the Minneapolis Fire Department (individually and in his official capacity), Defendant.	Case No. 10-cv-4112 (SRN/SER) JURY VERDICT FORM
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1. Did Plaintiff Kidd prove by the greater weight of the evidence that her written comments about Defendant Jackson, expressed in the 360 degree survey responses, were a motivating factor in Defendant Jackson's decision to unappoint her?

 X YES NO

(Mark an "X" in the appropriate space)

NOTE: Complete the following paragraphs only if the above answer is "yes." If the above answer is "no," have your foreperson sign and date this form because you have completed your deliberation on this case.

2. Did Defendant Jackson prove by the greater weight of the evidence that he would have unappointed Plaintiff Kidd on June 30, 2009 regardless of her responses to the 360 degree survey?

 YES X NO

(Mark an "X" in the appropriate space)

NOTE: Complete the following paragraphs only if the above answer is "no." If the above answer is "yes," have your foreperson sign and date this form because you have completed your deliberation on this case.

3. What amount of money will fairly and adequately compensate Plaintiff Kidd for damages caused by her unappointment?

Wage loss and loss of benefits \$ 91,324.00

Emotional Distress \$ 30,000.00

4. Did Plaintiff Kidd prove by the greater weight of the evidence that Defendant Jackson's decision to demote Plaintiff Kidd was motivated by evil intent, or that Defendant Jackson acted with reckless indifference to Plaintiff Kidd's rights?

X YES _____ NO

(Mark an "X" in the appropriate space)

NOTE: Complete the following paragraphs only if the above answer is "yes." If the above answer is "no," have your foreperson sign and date this form because you have completed your deliberation on this case.

5. Do you choose to award Plaintiff Kidd an additional amount as punitive damages to punish Defendant Jackson for engaging in misconduct and to deter Defendant Jackson and others from engaging in such misconduct in the future?

X YES _____ NO

(Mark an "X" in the appropriate space)

NOTE: Complete the following paragraphs only if the above answer is "yes." If the above answer is "no," have your foreperson sign and date this form because you have completed your deliberation on this case.

6. We find the amount of damages that will serve to punish Defendant Jackson and deter others from behaving in a similar way to be:

\$ 300,000.00

Date: 12-20-2012

SIGNATURE REDACTED

Signature of Foreperson

SIGNATURE REDACTED